

EXHIBIT 22

RE: LeDoux v. Outliers, Inc. et al.; No. 3:24-cv-05808-TMC - Request for Depositions

1 message

Rick Houghton <rhougton@mbssmartlaw.com>

Thu, Apr 17, 2025 at 9:18 AM

To: Jen Bassetti <jen@ucmj-defender.com>

Cc: Jocelyn Stewart <jocelyn@ucmj-defender.com>, Talis Abolins <tabolins@mctlaw.com>, "christianm.mcguire@gmail.com" <christianm.mcguire@gmail.com>, Christian McGuire <cmcguire@mbssmartlaw.com>, Quinn Murphy <qmurphy@mbssmartlaw.com>, "kgreenberg@aretelaw.com" <kgreenberg@aretelaw.com>, "jfischer@aretelaw.com" <jfischer@aretelaw.com>, Jeremy Roller <jroller@aretelaw.com>, Michelle Stratton <mstratton@mbssmartlaw.com>, "lfriedl@grsm.com" <lfriedl@grsm.com>, Kevin Craig <kcraig@grsm.com>, "Seaasbestos@grsm.com" <seaasbestos@grsm.com>, Joshua Severit <jseverit@mgmlaw.com>, Janice Sova <jsova@mgmlaw.com>, David Fisher <dfisher@mgmlaw.com>, Maggie Weilmuenster <mweilmuenster@mgmlaw.com>, "Daniel R. Olsen" <dolsen@mgmlaw.com>, "Olsen_law@comcast.net" <olsen_law@comcast.net>

Hi Jocelyn and Talis,

Thanks for your email. I confirm receipt.

At this stage, a request for deposition dates is premature. The nonparties have not yet had the opportunity to confer with Plaintiff regarding the anticipated length, location, or scope of the depositions. Nor have the parties conferred on the scope of any potential document production.

We believe it makes sense to address those issues first. That discussion will inform whether the nonparties will seek protection or move to quash—issues that should be resolved before deposition scheduling.

Please let us know your availability for a conference during the week of April 28. The nonparties reserve all rights.

Best regards,
 Rick Houghton

From: Jen Bassetti <jen@ucmj-defender.com>

Sent: Wednesday, April 16, 2025 1:50 PM

To: Rick Houghton <rhougton@mbssmartlaw.com>

Cc: Jocelyn Stewart <jocelyn@ucmj-defender.com>; Talis Abolins <tabolins@mctlaw.com>; christianm.mcguire@gmail.com; Christian McGuire <cmcguire@mbssmartlaw.com>; Quinn Murphy <qmurphy@mbssmartlaw.com>; kgreenberg@aretelaw.com; jfischer@aretelaw.com; Jeremy Roller <jroller@aretelaw.com>; Michelle Stratton <mstratton@mbssmartlaw.com>; lfriedl@grsm.com; Kevin

Craig <kcraig@grsm.com>; Seaasbestos@grsm.com; Joshua Severit <jseverit@mgmlaw.com>; Janice Sova <jsova@mgmlaw.com>; David Fisher <dfisher@mgmlaw.com>; Maggie Weilmuenster <mweilmuenster@mgmlaw.com>; Daniel R. Olsen <dolsen@mgmlaw.com>; Olsen_law@comcast.net
Subject: Re: LeDoux v. Outliers, Inc. et al.; No. 3:24-cv-05808-TMC - Request for Depositions

Good afternoon Mr. Houghton,

In follow-up to my email dated April 8, 2025, please provide dates of availability for the depositions of Sameer Anand and Maranda Lujajohnson between May 19-30. Thank you.

Jen L. Bassetti-Sirjesse

Litigation Paralegal

Law Office of Jocelyn C Stewart, Corp.
1201 Pacific Avenue, Suite 600
Tacoma, WA 98402

From: Jen Bassetti <jen@ucmj-defender.com>
Sent: Tuesday, April 8, 2025 8:53 AM
To: Rick Houghton <rhoughton@mbssmartlaw.com>
Cc: Jocelyn Stewart <jocelyn@ucmj-defender.com>; Talis Abolins <tabolins@mctlaw.com>; christianm.mcguire@gmail.com <christianm.mcguire@gmail.com>; Christian McGuire <cmcguire@mbssmartlaw.com>; Quinn Murphy <qmurphy@mbssmartlaw.com>; kgreenberg@aretelaw.com <kgreenberg@aretelaw.com>; jfischer@aretelaw.com <jfischer@aretelaw.com>; Jeremy Roller <jroller@aretelaw.com>; Michelle Stratton <mstratton@mbssmartlaw.com>; lfriedl@grsm.com <lfriedl@grsm.com>; Kevin Craig <kcraig@grsm.com>; Seaasbestos@grsm.com <seaasbestos@grsm.com>; Joshua Severit <jseverit@mgmlaw.com>; Janice Sova <jsova@mgmlaw.com>; David Fisher <dfisher@mgmlaw.com>; Maggie Weilmuenster <mweilmuenster@mgmlaw.com>; Daniel R. Olsen <dolsen@mgmlaw.com>; Olsen_law@comcast.net <olsen_law@comcast.net>
Subject: LeDoux v. Outliers, Inc. et al.; No. 3:24-cv-05808-TMC - Request for Depositions

Mr. Houghton,

It is our understanding that your office represents Sameer Anand and Maranda Lujajohnson. Attached find Notices of Intent to Subpoena with 10-days notice and a Subpoena dated for service on April 18, 2025. Thank you for accepting receipt of the subpoenas on behalf of your clients.

Plaintiff would like to depose both witnesses within 2 weeks of receipt of their document production. Please provide dates of availability for both witnesses between May 19 - 30. We will schedule the deposition and send an updated Subpoena and zoom link upon confirmation.

Thank you.

Jen L. Bassetti-Sirjesse

Litigation Paralegal

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Tacoma, WA 98402